

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, by her parents and next friends Sara Tirrell and Zachary Tirrell, *and*

Iris Turmelle, by her parents and next friends, Amy Manzelli and Chad Turmelle,

Plaintiffs,

v.

Frank Edelblut, *in his official capacity as Commissioner of the New Hampshire Department of Education;*

Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro, Rajesh Nair, James Fricchione, and James Leboe, *in their official capacities as members of the New Hampshire State Board of Education;*

Pemi-Baker Regional School District;

Pembroke School District;

Donald J. Trump, *in his official capacity as President of the United States*, 1600 Pennsylvania Avenue NW, Washington, DC 20220;

U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington, DC 20530;

Pamela Bondi, *in her official capacity as Attorney General of the United States*, 950 Pennsylvania Avenue NW, Washington, DC 20530;

Civil Case No. 1:24-cv-00251-LM-TSM

U.S. Department of Education,
400 Maryland Avenue SW,
Washington, DC 20202; and

Denise L. Carter, *in her official capacity as Acting Secretary of the United States Department of Education*, 400 Maryland Avenue SW,
Washington, DC 20202.

Defendants,

and

Female Athletes United.

Proposed Intervenor-Defendant.

**INTERVENOR-DEFENDANT'S MOTION
FOR LEAVE TO FILE REPLY**

Under Local Rule 7.1(e)(2), Female Athletes United respectfully moves for leave to file a reply to the plaintiffs' opposition to its intervention motion.

1. FAU moved to intervene as a defendant on February 21st. The plaintiffs then sought an extension to respond, which the Court granted. They opposed FAU's intervention motion on March 27th.

2. FAU now moves for leave to file a reply to that opposition—for three reasons. First, the plaintiffs mischaracterize several cases about allowing affected athletes or students to intervene in situations like this one. Second, the plaintiffs mischaracterize FAU's position on its interests in this case. The Court should allow FAU to address those mischaracterizations. And third, put simply, whether the Court allows FAU to intervene here is a big deal. This case affects its members as much as it affects the plaintiffs because the Court will decide whether they have to compete against biological males who are, on average, inherently bigger, stronger, and faster than them. And FAU has members in New Hampshire and throughout the Nation directly affected by this case. Allowing FAU a reply in support of its motion to intervene will only help the Court decide that important issue.

3. The Court should grant the motion for leave to file a reply. As required by Local Rule 7.1(e)(2), that proposed reply is attached.

4. Finally, under Local Rule 7.1(c), FAU certifies that it has made a good-faith attempt to obtain concurrence from the existing parties on this motion. The plaintiffs assent to this motion. Commissioner Edelblut and the members of the State Board of Education take no position on this motion. Pemi-Baker Regional School District and Pembroke School District take no position. And the federal defendants take no position on this motion. Also, FAU notes, now that the federal defendants have entered an appearance, that it has made a good-faith attempt to obtain their concurrence on the intervention motion, but it has not received a response about that motion.

Respectfully submitted this 3rd day of April 2025.

s/ Ian B. Huyett

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of April 2025, I filed a true and accurate copy of the foregoing documents with the Clerk of the Court using the CM/ECF system, which automatically sends an electronic notification to the following parties:

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